

United States Courts
Southern District of Texas
FILED

June 05, 2024

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

SEMAJ SAMM,

Defendant.

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§

CRIMINAL NO. 4:24-cr-00310

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, O'Reilly Auto Parts is an international auto parts retail chain headquartered in Springfield, Missouri, with locations throughout the United States and abroad. Additionally, currency and goods related to this business are shipped in interstate commerce and affect interstate commerce.

At all times material to this Indictment, KFC is an international fast-food chain headquartered in Louisville, Kentucky, with locations throughout the United States and abroad. Additionally, currency and goods related to this business are shipped in interstate commerce and affect interstate commerce.

COUNT ONE

Title 18, United States Code, § 1951(a) and 2
Aiding and Abetting Interference with Commerce by Robbery

On or about January 1, 2024, in the Houston Division of the Southern District of Texas,

SEMAJ SAMM

aiding and abetting others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§

1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of **O'Reilly Auto Parts, located at 4515 Griggs Rd., Houston, TX 77021**, which was in the possession and custody of an employee of O'Reilly Auto Parts, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items, in violation of Title 18, United States Code, § 1951(a) and 2.

COUNT TWO

Title 18, United States Code, § 924(c)(1)(A) and 2
Aiding and Abetting Using and Carrying a Firearm during and in
Relation to a Crime of Violence

On or about January 1, 2024, in the Houston Division of the Southern District of Texas,

SEMAJ SAMM

aiding and abetting others known and unknown to the Grand Jury, did knowingly carry and brandish a firearm, namely, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that being **Interference with Commerce by Robbery**, in violation of Title 18, United States Code, § 924(c)(1)(A)(ii) and 2.

COUNT THREE

Title 18, United States Code, § 1951(a)
Aiding and Abetting Interference with Commerce by Robbery

On or about January 2, 2024, in the Houston Division of the Southern District of Texas,

SEMAJ SAMM

aiding and abetting others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of **KFC, located at 1526 N. Loop W, Houston, Texas 77018**, which was in the possession and custody of an employee of

KFC, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items, in violation of Title 18, United States Code, § 1951(a) and 2.

COUNT FOUR

Title 18, United States Code, § 924(c)(1)(A) and 2
Aiding and Abetting Using and Carrying a Firearm during and in
Relation to a Crime of Violence

On or about January 2, 2024, in the Houston Division of the Southern District of Texas,

SEMAJ SAMM

aiding and abetting others known and unknown to the Grand Jury, did knowingly carry and brandish a firearm, namely, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that being **Interference with Commerce by Robbery**, in violation of Title 18, United States Code, § 924(c)(1)(A)(ii) and 2.

COUNT FIVE

Title 18, United States Code, § 1951(a)
Aiding and Abetting Interference with Commerce by Robbery

On or about January 2, 2024, in the Houston Division of the Southern District of Texas,

SEMAJ SAMM

aiding and abetting others known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of **O’Reilly Auto Parts, located at 2655 Tidwell Rd., Houston, Texas 77093**, which was in the possession and custody of an employee of O’Reilly Auto Parts, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items, in violation of Title 18, United States Code, § 1951(a) and 2.

COUNT SIX

Title 18, United States Code, §§ 924(c)(1)(A) and 2
Aiding and Abetting Using and Carrying a Firearm during and in
Relation to a Crime of Violence

On or about January 2, 2024, in the Houston Division of the Southern District of Texas,

SEMAJ SAMM,

aiding and abetting others known and unknown to the Grand Jury, did knowingly carry and brandish a firearm, namely, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that being **Interference with Commerce by Robbery**, in violation of Title 18, United States Code, § 924(c)(1)(A)(ii) and 2.

A TRUE BILL:

Original Signature on File

FOREMAN OF THE GRAND JURY

ALAMDAR S. HAMDANI
United States Attorney

BY: Sebastian A. Edwards
Sebastian A. Edwards
Assistant United States Attorney